KPMG Consulting

OBSERVATION 106

BellSouth Florida OSS Testing Evaluation

Date: August 14, 2001

OBSERVATION REPORT

KPMG Consulting has identified an observation as a result of the test activities associated with the Provisioning Verification and Validation (TVV4).

Observation:

BellSouth's systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG Consulting.

Background:

As part of its Operational Support System (OSS) testing efforts in Florida, KPMG Consulting has been conducting a Directory Listing Verification test to ensure that the information in the directory database is correctly updated and consistent with the local service request.

KPMG Consulting visited the BellSouth Directory Assistance Center in Atlanta, Georgia to obtain the printouts from the directory listing system. KPMG Consulting compared the printouts with the information on Local Service Request (LSRs) submitted by KPMG Consulting.

KPMG Consulting expects the information on the printout to be consistent with

- the information on the submitted directory listing (DL) form of the LSR, or
- the information on the Customer Service Record (CSR) prior to the transaction if a DL form was not submitted with the LSR.

Issue:

KPMG Consulting applies a success standard of 95%[1] when testing updates to the directory database. KPMG Consulting has reviewed 217 listing records. KPMG Consulting has identified that the directory listing records of 20 telephone numbers were not consistent with the information in the LSR submitted to Bellsouth. Based on initial findings, BellSouth is currently at a 91% success rate. KPMG Consulting has identified the following discrepancies:

[1] KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

1. The information inputted in the LNFN (Listed Name First) field on the directory listing (DL) form was not populated in the Given Name field in the directory-listing database, but was populated in the Name1 field, a field for the information inputted in the LNLN (Listed Name Last) field on the DL form. The details outline below:

005081FPEJ101001	00	8504690697	9990	Business	**"Daveco C"** populated the NAME1 field of the printout, while **"Daveco"** populated the LNLN field and **"C."** populated the LNFN field of the DL form.
005081FPEJ100003	00	9045981824	9990	Business	**"Daveco J"** populated the NAME1 field of the printout, while **"Daveco"** populated the LNLN field and **"J."** populated the LNFN field of the DL form.
005081FPEJ100004	00	8504691891	9990	Business	**"Daveco T"** populated the NAME1 field of the printout, while **"Daveco"** populated the LNLN field and **"T."** populated the LNFN field of the DL form.

2. The following Directory Listing was spelled incorrectly:

PON	VER	LTN	CC	Type of Account	Result
020021FPTN108011	01	8502365611	9990	Residential (R)	The Shoot Bamboo's listing has a misspelled street name. The LASN field in the DL form is Nautilus, but the STNAME appears on the directory-listing

					database as Nautilis.

3. Incorrect listing type: Per BellSouth, the BGN value and NP value in the LISTYP field on the printouts from the Directory One System means "Business Non-Pub" and "Non-Pub", respectively. The following telephone numbers have the incorrect values in the LISTYP field:

001161FPRN100018	00	5618339367	9990	Residence	LISTYP in the Directory One System is BGN. The LSR was sent with the TOS (type of service) of 2BF (Residence – Single line – Flat Rate). No DL form was sent with the LSR. The record was updated on April 9, 2001 (MechDt).
001161FPLN100019	00	5618359737	9990	Residence	LISTYP in the Directory One System is BGN. The LSR was sent with the TOS (type of service) of 2BF (Residence – Single line – Flat Rate). No DL form was sent with the LSR. The record was updated on April 10, 2001 (MechDt).
035021FPTN000006	01	4073528714	9993	Residence	LISTYP in the Directory One System is BGN. The LSR was sent with the TOS (type of service) of 2HF (Residence – ISDN BRI – Flat Rate). No DL form was sent with the LSR. The record was updated on

					April 6, 2001 (MechDt).
035051FPMC010005	00	3053588351	9990	Residence	LISTYP in the Directory One System is BGN. The LSR was sent with the TOS (type of service) of 2HM (Residence – ISDN BRI – Measured). No DL form was sent with the LSR. The record was updated on April 6, 2001 (MechDt).

4. The wrong name appears in the NAME1 field of the printout from the Directory One System. "Richcom" was populated in the Listed Name Last (LNLN) field on the DL form submitted to BellSouth and should have been populated in the NAME1 field in the Directory One System. Furthermore, the printout has an IC style code whereas the DL form specifies a SL style code. The detail is outlined below:

011071FPEJ001007	02	5613669429	9993	Business	**Broadband Communications Group** populates the NAME1 field of the printout, while the LNLN field of the DL form specified **Richcom**. The DL form specifies a Style Code of **SL**, while the DL printout displayed a style code of **IC**.

5. The following orders were sent to change the main telephone number and change the listing to the new telephone number. KPMG Consulting found that the old telephone number was found in the system while the new telephone number was not found in the system.

011071FPRJ000020	00	8502360915	9993	Business	The listing for 8502360915 was not found while the listing for 8502368547 was found.
011071FPLJ000022	00	8502330675	9993	Business	The listing for 8502350675 was not found while the listing for 8502309822 was found.

6. The following orders were sent to disconnect the main telephone number and add the new main listing. KPMG Consulting found that the old telephone number was found in the system while the new telephone number was not found in the system.

018042FPTN002007	00	8504332509	9993	Business	The listing for 8504332509 was not found while the listing for 8504331799 was found.
018042FPTN000010	02	9545228922	9993	Business	The listing for 9545228922 was not found while the listing for 9545222393 was found.
018042FPTN000011	01	9547668876	9993	Business	The listing for 9547668876 was not found while the listing for 9547662598 was found.

7. The LSR of the following order was sent on May 3, 2001 and the CN was received on May 21, 2001. The order was sent to establish a resale residential customer with two listings. KPMG Consulting did not find the listing records in the Nortel Directory One System.

020021FPTN100014	01	4079037394	9990	Residence	Two DL forms were

					submitted. However, no listing was found in the Directory One System.

8. The following order was submitted without a DL form. However, a change was made to the listing type. Per the CSR prior to the order submission, the listing type was "Non-Pub". The listing type should have remained the same.

035081FPMC010002	00	8502345825	9990	Business	The L value (listed) was found in the LISTYP. No DL form was submitted with this order. The listing type should have remained as Non-Pub.

9. The following order was submitted to change the listing to straight-line listing. However, the listing was changed to "Business Non-Pub".

071061FPEI002001	00	3053720237	7125	Business	The BGN value was populated in the LISTYP field of the Directory One System while the "1" value (listed) was populated in the LTY field in the DL form.
074052FPEF000006	00	3057555617	9990	Residence	The NL value (Non-listed) was populated in the LISTYP field of the Directory One System while the "1" value (listed) was populated in the LTY field in the DL form.

10. The following order was submitted on June 18, 2001 to establish the straight line listing for 3057696828. The name that was populated in the DL form was "Flo South". The address that was populated in the DL form was "2660 E Superior St". The LTY field in the DL form was populated with "1" (listed). The order was completed on June 26, 2001.

072011FPTF100034	00	3057696828	9990	Residence	Incorrect name, address, and LISTYP.

11. The following order was submitted to convert a resale residential line to UNE SL1 analog loop line. The old telephone number (5618354104) was disconnected. However, KPMG Consulting found that a record for 5618354104 in the Directory One System.

079011FPTH001010	00	5618354104	9990	Residence	The listing for 5618354104 was still in the Directory One System when the telephone number was disconnected.

Impact:

BellSouth's inability to accurately update the information in the directory listing databases may result in a decrease in customer satisfaction. A mishandle of customer requests will negatively impact a customer's view of a CLEC's service quality.

KPMG Consulting

OBSERVATION 107

BellSouth Florida OSS Testing Evaluation

Date: August 16, 2001

OBSERVATION REPORT

KPMG Consulting has identified an exception as a result of the Maintenance & Repair ECTA Performance Evaluation (TVV-8)

Exception:

The BellSouth Electronic Bonding Trouble Administration system failed to appropriately process 'cancelTroubleReport' transactions. (TVV8)

Background:

On August 08, 2001, KPMG Consulting initiated 132 'cancelTroubleReport' transactions (over a period of 12 hours) as part of the ECTA Performance evaluation test.

Issue:

KPMG Consulting observed an 11.36% failure rate amongst the 'cancelTroubleReport' transactions (15 out of 132). Failures were all 110 trading partner errors.

The following is a comprehensive list of all erroneous 'cancelTroubleReport' transactions generated on August 08, 2001:

LFL00362960	cancelTroubleReport	8/8/01 8:06	8/8/01 8:06	8	110
LFL00268714	cancelTroubleReport	8/8/01 8:36	8/8/01 8:36	6	110
LFL00327998	cancelTroubleReport	8/8/01 8:51	8/8/01 8:51	8	110
LFL00328773	cancelTroubleReport	8/8/01 9:11	8/8/01 9:11	10	110
LFL00274542	cancelTroubleReport	8/8/01 9:56	8/8/01 9:56	6	110
LFL0091688	cancelTroubleReport	8/8/01 10:56	8/8/01 10:56	6	110
LFL00284736	cancelTroubleReport	8/8/01 12:21	8/8/01 12:21	7	110

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LFL0098508	cancelTroubleReport	8/8/01 12:26	8/8/01 12:26	6	110
LFL00388907	cancelTroubleReport	8/8/01 13:46	8/8/01 13:46	9	110
LFL00344785	cancelTroubleReport	8/8/01 13:51	8/8/01 13:51	8	110
LFL00390674	cancelTroubleReport	8/8/01 14:11	8/8/01 14:11	8	110
LFL00393743	cancelTroubleReport	8/8/01 15:01	8/8/01 15:01	6	110
LFL00181551	cancelTroubleReport	8/8/01 15:19	8/8/01 15:19	7	110
LFL00300675	cancelTroubleReport	8/8/01 16:01	8/8/01 16:01	0	110
LFL00399695	cancelTroubleReport	8/8/01 16:21	8/8/01 16:21	0	110

Question:

Why is the ECTA system returning 110-errors on 'cancelTroubleReport' transactions?

Date: August 16, 2001

OBSERVATION REPORT

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

Observation:

***BellSouth Business Rules for Local Ordering - OSS99*[1], contains inconsistent and incomplete instructions necessary for Competitive Local Exchange Carriers (CLECs) to access and use BellSouth's systems. (TVV1)**

Background:

CLECs rely heavily on complete and accurate information from *BellSouth Business Rules for Local Ordering - OSS99* that consistently and completely outline the methods and procedures for ordering local service from BellSouth.

Issues:

KPMG Consulting has identified inconsistent or incomplete guidelines resulting from *BellSouth Business Rules for Local Ordering - OSS99 Issue 9O.*

Inconsistent Documentation	For REQTYP A/ACT D requests, the chart on page 276 states that the LS form /screen is required. This chart also states that the LNA is "prohibited unless SECNCI is populated" for this REQTYP/ACT combination. The LNA field, however, is always required on the LS form.
Inconsistent Documentation	For Direct Inward Dialing (DID) Resale service, the R/C/O chart for REQTYP N/ ACT C (pages 813-814) reflects that this service request is supported electronically and manually. Furthermore, the "Types of Complex Products/Services" chart (Section 13.3) lists the complex products that can only be ordered manually but does not include REQTYP N/ACT C and ACT D, which supports KPMG Consulting's understanding that such requests may be ordered electronically. KPMG Consulting, however, discovered that BellSouth does not electronically support REQTYP N/ACT C and REQTYP N/ACT D requests through communication with a BellSouth Customer Service Manager (CSM).[2]
Inconsistent and Incomplete Documentation	PON 020011FPMC010027 Version 2 (CC 9990) was a REQTYP E/ACT N (non-complex) request that was submitted manually and received an error stating that the Line Class of Service (LNECLS SVC)

[1] *BellSouth Business Rules for Local Ordering – OSS99, Issue 90 June 29,* 2001. This document can be found at the following URL: http://www.interconnection.bellsouth.com/guides/html/leo.html

[2] Communication with the CSM occurred in relation to error responses returned on PON 061041FPEZ000001 (Version 00, CC 9993) and PON 060011FPEZ002001 (Version 00, CC 9993).

	field needs to be populated. Communication with two BellSouth representatives and one manager from the Local Carrier Service Center (LCSC) regarding this error confirmed that the LCSC could not complete this request unless the LNECLS SVC is populated on the order. According to the R/C/O chart on pages 595-596 (RS form with LNA of N), LNECLS SVC, however, is only required for electronic ordering. Additionally, there is no LNECLS SVC field located on the manual RS form. Further communication with the LCSC revealed that the LNECLS SVC value should be populated in the FEATURE field of the manual RS form.

Impact:

Omissions and errors in BellSouth documentation may increase operating costs, and decrease customer satisfaction. A lack of consistency and completeness may cause undue errors, and require additional CLEC resources to research solutions. Errors may also reduce the timeliness with which services can be provided to CLEC customers.

KPMG Consulting

OBSERVATION 109

BellSouth Florida OSS Testing Evaluation

Date: August 20, 2001

OBSERVATION

KPMG Consulting has identified an Observation as a result of the Work Center Support Evaluation (PPR-8).

Observation:

The service-level of access objectives for BellSouth's wholesale and retail call centers are not at parity. (PPR8)

Background:

Competitive Local Exchange Carriers (CLECs) may encounter various issues during the ordering process. Issues range from questions regarding business rules to problems with submitted orders. In order to support CLECs, BellSouth has established a customer support center, the Fleming Island Local Carrier Service Center (LCSC), in Jacksonville, FL.

Issue:

BellSouth's wholesale and retail call centers have different service level of access objectives.

During an interview[1] at BellSouth's Fleming Island LCSC, KPMG Consulting was informed that the service level of access objective for the center is 95% calls answered within 180 seconds. During an interview[2] at BellSouth's Mid-Market Account center, which serves retail customers, KPMG Consulting was informed that the center has a service level of access objective of 85% calls within 20 seconds.

Impact:

The disparity in service level of access objectives between wholesale and retail call centers may result in longer order processing for CLECs than for BellSouth retail customers. CLECs' retention of customers may therefore be negatively impacted by customer dissatisfaction resulting from delays in provisioning service requests due to delays in processing.

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[1] Interview at BellSouth's Fleming Island call center in Jacksonville FL - August 1, 2001.

[2] Interview at BellSouth's Mid-Market Account center in Jacksonville, FL - January 30, 2001.

KPMG Consulting

OBSERVATION 111

BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

OBSERVATION

KPMG Consulting has identified an Observation as a result of the Work Center Support Evaluation (PPR-8).

Observation:

BellSouth has implemented an inadequate process for CLEC interaction with the Local Carrier Service Center (LCSC) Fleming Island Call Center. (PPR8)

Background:

Competitive Local Exchange Carriers (CLECs) may encounter various issues during the ordering process. Issues range from questions regarding business rules to problems with submitted orders. In order to support CLECs, BellSouth has established a customer support center, the Fleming Island LCSC, in Jacksonville, FL.

Calls made to BellSouth's LCSC are automatically routed to the Fleming Island call center for assistance by dedicated call center representatives.

Issue:

During interviews[1] conducted at BellSouth's Fleming Island LCSC, KPMG Consulting was informed that call center Service Representatives are trained to accept a maximum of five Purchase Order Numbers (PONs) per CLEC phone call. CLECs calling with more than five PONs per phone call are asked to call back for continued assistance. KPMG Consulting was informed that this procedure was introduced in order to balance resource usage within the call center.

This call restriction does not adequately accommodate CLECs who might have a single issue affecting more than five PONs.

Impact:

Without adequate call-center procedures, CLECs cannot be certain that BellSouth will provide dependable and consistent assistance in support of their business requirements. This could hinder CLECs' ability to submit orders and deliver service to their customers.

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[1] Fleming Island call center in Jacksonville FL on March 5, 2001 and in Orange Park, FL on August 1, 2001.

KPMG Consulting

OBSERVATION 112

BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Definitions and Standards Development and Documentation Verification & Validation Review. (PMR-2)

Observation:

The formula specified in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) document is inconsistent with the benchmark ordered by the Florida Public Service Commission. (PMR2)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission (FPSC), BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is assessing the consistency between the documented formulas for calculating SQMs and FPSC-ordered benchmarks.

KPMG Consulting's analysis of the documented calculation formula and FPSC-ordered benchmark for the "Ordering: Acknowledgement Message Timeliness" SQM found that there are inconsistencies between the benchmark and the documented formula for calculating the SQM.

In the "Ordering: Acknowledgement Message Timeliness" SQM, the documented formula requires the calculation of a mean, whereas the FPSC ordered benchmark specifies the target level of service to be measured as a percentage attained within a specified time interval.

Impact:

CLECs and regulators rely on BellSouth's metric reports to gauge the level of service provided by BellSouth. When metric values are not reported in a manner that is consistent with FPSC-ordered benchmarks, it is difficult to gauge BellSouth's performance.

Section 2: Ordering

O-1: Acknowledgement Message Timeliness

Definition

This measurement provides the response interval and percent within the interval from the time an LSR or transmission (may contain multiple LSRs from one or more CLECs in multiple States) is electronically submitted via EDI or TAG respectively until an acknowledgement notice is sent by the system.

Exclusions

- Scheduled OSS Maintenance

Business Rules

The process includes EDI & TAG system functional acknowledgements for all messages/Local Service Requests (LSRs) which are electronically submitted by the CLEC. Users of EDI may package many LSRs into one transmission which will receive the acknowledgement message. EDI users may place multiple LSRs in one "envelope" requesting service in one or more states which will mask the identity of the state and CLEC. The start time is the receipt time of the message at BellSouth's side of the interface (gateway). The end time is when the acknowledgement is transmitted by BellSouth at BellSouth's side of the interface (gateway). If more than one CLEC uses the same ordering center (aggregator), an Acknowledgement Message will be returned to the "Aggregator". However, BellSouth will not be able to determine which specific CLEC or state this message represented.

Calculation

Response Interval = (a - b)

- a = Date and Time Acknowledgement Notices returned to CLEC
- b = Date and Time messages/LSRs electronically submitted by the CLEC via EDI or TAG respectively

Average Response Interval = (c ÷ d)

- c = Sum of all Response Intervals
- d = Total number of electronically submitted messages/LSRs received, from CLECs via EDI or TAG respectively, in the Reporting Period.

Percent within interval = (e / f) X 100

- e = Total number of electronically submitted messages/LSRs received, from CLECs via EDI or TAG respectively, in the Reporting Period.
- f = Total number of electronically submitted messages/LSRs acknowledged in the Reporting Period.

Reporting Structure

- CLEC Aggregate
- CLEC Specific/Aggregator
- Geographic Scope
  - Region
- Electronically Submitted LSRs
  0 – ≤10 minutes
  >10 – ≤20 minutes
  >20 – ≤30 minutes
  0 – ≤ 30 minutes
  >30 – ≤45 minutes
  >45 – ≤60 minutes

>60 – ≤120 minutes
>120 minutes
- Average interval for electronically submitted messages/LSRs in minutes

Data Retained

Relating to CLEC Experience	Relating to BellSouth Experience
• Report Month • Record of functional acknowledgements	• Not Applicable

SQM Disaggregation - Analog/Benchmark

SQM LEVEL of Disaggregation	SQM Analog/Benchmark
• EDI	• EDI - 90% within 30 minutes (05/01/01) - 95% within 30 minutes (08/01/01)
• TAG	• TAG – 95% within 30 minutes

KPMG Consulting

OBSERVATION 113

BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5).

Observation:

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM. (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as needed to KPMG Consulting.

Issue:

KPMG Consulting discovered that the computation instructions for the "Provisioning: LNP-Total Service Order Cycle Time" SQM are insufficient for calculating metrics values.

- BellSouth's instructions do not address how users should distinguish between Mechanized, Partially Mechanized, and Non-Mechanized orders.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

[1] These reports are posted on the PMAP Web site.
[2] The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."
[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the July 25, 2001 version 2.1.06 of the Manual.

Furthermore, Step 2 in the RDUM states that:

> *BellSouth excludes Sundays and holiday hours in the calculation of* ***duration_day*** *as per the current SQM. The SQM contains a detailed description of the exclusions performed.*

KPMG Consulting is unable to identify any exclusions in the current *Revised Interim SQM*[4] related to Sundays and holiday hours. Since the RDUM user, not BellSouth, constructs the duration_day field, either 1) exclusions BellSouth applies in its internal calculations have not been documented in the *Revised Interim SQM* or 2) this statement was included in error. If no Sunday and/or holiday exclusions are applied, KPMG Consulting feels that this statement is misleading and should be removed to avoid unnecessary confusion.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. BellSouth's insufficient documentation prevents CLECs from calculating the metrics values for the "Provisioning: LNP-Total Service Order Cycle Time" SQM. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

[4] KPMG Consulting used the June 1, 2001 version 3.00 of the *Florida Interim Performance Metrics* document as a basis to perform this test.

KPMG Consulting

OBSERVATION 114

BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

OBSERVATION

KPMG Consulting has identified an Observation as a result of the Manual Order Process Evaluation (PPR-7).

Observation:

The performance evaluation processes and procedures for BellSouth's Retail and Wholesale manual ordering centers are not at parity. (PPR7)

Background:

Competitive Local Exchange Carriers' (CLECs) Local Service Requests (LSRs) are received at the BellSouth Local Carrier Service Center (LCSC), where service representatives process them to generate service orders.

KPMG Consulting conducted interviews at BellSouth's Local Carrier Service Centers[1], and at BellSouth's Retail manual ordering centers[2].

Issue:

Wholesale and retail manual order processing service representatives have different performance measurement procedures.

During interviews at the wholesale centers and upon review of related documentation, KPMG Consulting determined that the wholesale manual ordering service representatives are evaluated on two measures: Service Order Accuracy (SOA) and productivity, which is expressed as Local Service Requests processed per hour. Objectives vary depending on the product group, i.e., Resale or UNE. KPMG Consulting also learned that SOA objectives for wholesale service representatives for complex orders have not yet been defined and that productivity data for this employee group is being used to develop a diagnostic Performance Measurement Plan.

During interviews at the retail centers and upon review of related documentation, KPMG Consulting determined that retail center service representatives are evaluated using different criteria than the wholesale center representatives. Specifically, the retail center

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[1] Atlanta LCSC on September 20, 2001, February 26, 2001, and July 20, 2001. Birmingham LCSC on February 5, 2001.

[2] Business Sales Account Center on January 25, 2001 in Atlanta, GA. Mid-Market Account Center on January 30, 2001 in Jacksonville, FL. Major Account Center on January 31, 2001 in Jacksonville, FL

service representatives are evaluated on Speed of Error Correction, Service Order Quality, Adherence, and a general Competency/ Skill dimension. Furthermore, the performance evaluation process is defined in the Performance Summary Overview and in Objectives Coaching Job Aids.

Impact:

The disparity in performance evaluation measures at BellSouth Wholesale and Retail Centers may result in different levels of customer support to CLECs versus retail customers. CLECs' retention of customers may be directly impacted by customer dissatisfaction resulting from delays in order provisioning due to customer service delays at BellSouth.

KPMG Consulting

OBSERVATION 115

BellSouth Florida OSS Testing Evaluation

Date August 31, 2001

OBSERVATION REPORT

An observation has been identified as a result of test activities associated with the Documentation Review of the Account Establishment and Management Process (PPR-2).

Observation:

The BellSouth Account Team does not respond to CLEC inquiries within the documented customer contact timeframes. (PPR2)

Background:

The BellSouth Account Team Procedures, Account Team Information Package states that the Account Team is required to respond to CLEC e-mail and telephone/voicemail inquiries within 24 hours[1].

Issue:

KMPG Consulting in its role as test CLEC, has relied on its assigned BellSouth Account Team to be the initial point of contact to successfully conduct business in the local service market. From March 29, 2001 to August 24, 2001, KPMG Consulting did not receive a response within 24 hours for 42% of the total inquires made to the Account Team. KPMG Consulting would expect the BellSouth Account Team to follow the documented processes to ensure consistent performance. Attached is a summary of the inquiries KPMG Consulting made to the Account Team and the time it took to receive a response.

Impact:

The inability of the Account Team to consistently respond to CLEC inquiries within the specified timeframes negatively impacts a CLEC's ability to resolve customer issues and conduct business effectively.

[1] Account Team Procedures, Account Team Information Package, Version 7, Section 6.1, Page 16

KPMG Consulting / BellSouth – Account Management Communications
FLORIDA

1	August 15, 2001	9:07 E	KPMG to BST	E-mail: Subject: RE: OLNS Branding Order Form	August 24, 2001	7
2	August 13, 2001	12:22 E	KPMG to BST	E-mail: Subject: RE: OLNS Testing	August 15, 2001	2
3	August 13, 2001	12:18 E	KPMG to BST	E-mail: Subject: RE: OLNS Branding Order Form	August 15, 2001	2
4	August 7, 2001	9:56 E	KPMG to BST	E-mail: Subject: OLNS Branding Order Form	August 15, 2001	6
5	August 6, 2001	15:48 E	KPMG to BST	E-mail: Subject: OLNS Testing	August 15, 2001	7
6	July 27, 2001	14:32 E	KPMG to BST	E-mail: Subject: RE: OLNS Instructions and Application	August 1, 2001	3
7	July 25, 2001	9:45 E	KPMG to BST	E-mail: Subject: RE: OLNS Instructions and Application	July 27, 2001	2
8	July 24, 2001	9:59 E	KPMG to BST	E-mail: Subject: Data Request	July 24, 2001	0
9	July 23, 2001	18:14 E	KPMG to BST	E-mail: Subject: OLNS Instructions and Application	July 24, 2001	1
10	July 16, 2001	16:33 E	KPMG to BST	E-mail: Subject: Design Routing Codes	July 17, 2001	1
11	July 5, 2001	13:18 E	KPMG to BST	Phone Conversation: Subject: TAG API Training	July 5, 2001	0
12	June 25, 2001	16:23 E	KPMG to BST	E-mail: Subject: RE: CLEC to CLEC Migrations	June 26, 2001	1
13	June 25, 2001	13:57 E	KPMG to BST	E-mail: Subject: RE: CLEC to CLEC Migrations	June 25, 2001	0
14	June 25, 2001	9:57 E	KPMG to BST	E-mail: Subject: RE: CLEC to CLEC Migrations	June 25, 2001	0
15	June 14, 2001	13:53 E	KPMG to BST	E-mail: Subject: RE: CLEC to CLEC Migrations	June 25, 2001	7
16	June 14, 2001	13:53 E	KPMG to BST	E-mail: Subject: RE: CLEC to CLEC Migrations	June 14, 2001	1
17	June 11, 2001	18:00 E	KPMG to BST	E-mail: Subject: RE: TAG API Training	June 12, 2001	1
18	June 6, 2001	9:29 E	KPMG to BST	E-mail: Subject: RE: Billing Self Branding	June 6, 2001	0
19	June 6, 2001	8:13 E	KPMG to BST	E-mail: Subject: TAG API Training	June 7, 2001	1
20	June 5, 2001	11:25 E	KPMG to BST	E-mail: Subject: CLEC to CLEC Migrations	June 7, 2001	2

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21	May 31, 2001	15:52 E	KPMG to BST	E-mail: Subject: RE: Billing Self Branding	June 6, 2001	4
22	May 24, 2001	13:59 E	KPMG to BST	E-mail: Subject: RE: Order xDSL via LENS	May 25, 2001	1
23	May 22, 2001	17:40 E	KPMG to BST	E-mail: Subject: Centrex Order	May 25, 2001	3
24	May 18, 2001	17:50 E	KPMG to BST	E-mail: Subject: TAG App Ids	May 23, 2001	3
25	May 17, 2001	9:43 E	KPMG to BST	E-mail: Subject: RE: Ordering xDSL via LENs	May 17, 2001	0
26	May 15, 2001	15:18 E	KPMG to BST	E-mail: Subject: RE: TAG API Training	May 15, 2001	0
27	May 15, 2001	10:54 E	KPMG to BST	E-mail: Subject: Ordering xDSL via LENs	May 17, 2001	2
28	May 10, 2001	14:33 E	KPMG to BST	E-mail: Subject: RE: TAG API Training	May 10, 2001	0
29	May 4, 2001	10:30 E	KPMG to BST	E-mail: Subject: RE: OSDA Requests	May 4, 2001	0
30	May 3, 2001	10:27 E	KPMG to BST	E-mail: Subject: LMU-SI Form	May 4, 2001	1
31	May 1, 2001	8:51 E	KPMG to BST	E-mail: Subject: FW: OSDA/OLNS Requests	May 1, 2001	0
32	April 26, 2001	14:15 E	KPMG to BST	E-mail: Subject: RE: OLNS	April 26, 2001	0
33	April 20, 2001	14:09 E	KPMG to BST	E-mail: Subject: FW: TN Reservation	April 23, 2001	1
34	April 19, 2001	9:59 E	KPMG to BST	E-mail: Subject: RE: TAG API Training	April 24, 2001	3
35	April 18, 2001	14:28 E	KPMG to BST	E-Mail: Subject: OSDA/OLNS Requests	April 18, 2001	0
36	April 18, 2001	13:10 E	KPMG to BST	E-Mail: Subject: FW: OSDA/OLNS Requests	May 1, 2001	9
37	April 18, 2001	11:14 E	KPMG to BST	E-mail: Subject: RE: OLNS Request	April 18, 2001	0
38	April 17, 2001	11:52 E	KPMG to BST	E-mail: Subject: FW: OSDA/OLNS Requests	April 18, 2001	1
39	April 17, 2001	11:42 E	KPMG to BST	E-mail: Subject: RE: OSDA/OLNS Requests	April 18, 2001	1
40	April 16, 2001	11:49 E	KPMG to BST	E-mail: Subject: RE: OSDA/OLNS Requests	April 18, 2001	2
41	April 12, 2001	16:53 E	KPMG to BST	E-mail: Subject: FW: OSDA/OLNS Requests	April 16, 2001	2
42	April 12, 2001	16:53 E	KPMG to BST	E-mail: Subject: FW: OSDA/OLNS Requests	April 16, 2001	2
43	April 11, 2001	11:50 E	KPMG to BST	E-mail: Subject: FW: OSDA/OLNS Requests	April 11, 2001	0
44	April 9, 2001	14:38 E	KPMG to BST	E-mail: Subject RE: OSDA/OLNS Requests	April 10, 2001	1
45	April 9, 2001	12:51 E	KPMG to BST	E-mail: Subject: FW: TNs necessary for Centrex Orders	April 11, 2001	2
46	April 4, 2001	15:42 E	KPMG to BST	E-mail: Subject: FW: OLNS	April 4, 2001	0
47	April 3, 2001	17:03 E	KPMG to BST	E-mail: Subject: RE: DA-411 Code Conversion	April 4, 2001	1
48	April 3, 2001	12:48 E	KPMG to BST	E-mail: Subject: RE: DA-411 Code Conversion	April 3, 2001	0

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49	April 2, 2001	14:43 E	KPMG to BST	E-mail: Subject: RE; TNs necessary for Centrex Orders	April 11, 2001	7
50	April 2, 2001	13:31 E	KPMG to BST	E-mail: Subject: OLNS	April 4, 2001	2
51	March 29, 2001	15:57 E	KPMG to BST	E-Mail: Subject: RE: TNs necessary for Centrex Orders	April 2, 2001	2
52	March 29, 2001	9:10 E	KPMG to BST	E-mail: Subject: TNs necessary for Centrex Orders	March 29, 2001	0

KPMG Consulting

OBSERVATION 116

BellSouth Florida OSS Testing Evaluation

Date: August 31, 2001

OBSERVATION REPORT

An observation has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR-1).

Observation:

BellSouth did not follow the guidelines for notification of non-system impacting changes to the BellSouth Business Rules for Local Ordering (BBR-LO) as defined in the Change Control Process[1](PPR1).

Background:

The BellSouth Change Control Process (CCP) states that "All non-system impacting changes to the BellSouth business rule documentation will be provided to CLECs at least 30 calendar days in advance of the effective date (excluding expedites/defects)."[2]

BellSouth released Carrier Notification SN91082535[3] on August 3, 2001. The Carrier Notification stated that the BellSouth Business Rules for Local Ordering (BBR-LO) had been updated and that the newly updated business rules, Issue 9P, would be effective on August 3, 2001.

Issues:

BellSouth did not provide the notification of the BBR-LO update, version 9P, 30 calendar days before the effective date of the updated BBR-LO documentation.

Question:

KPMG Consulting requests that BellSouth explain why the update for version 9P of BBR-LO did not adhere the guidelines documented in the BellSouth Change Control Process.

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[1] Version 2.5, July 17, 2001

[2] Change Control Process, Version 2.5, July 17, 2001, Section 4.0, Part 2, Step 10, Sub-process 5, Page 36. The document is available at
http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/ccp_bccp_guide.pdf

[3] Carrier Notification SN91082535 available at
http://www.interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91082535.pdf

KPMG Consulting

OBSERVATION 117

BellSouth Florida OSS Testing Evaluation

Date: September 6, 2001

OBSERVATION REPORT

KPMG Consulting has identified an observation as a result of the test activities associated Provisioning Verification and Validation (TVV-4).

Observation:

KPMG Consulting has observed that BellSouth.net has access to greater information from a loop qualification report than that of a DLEC/CLEC requesting a loop qualification for the same telephone number. (TVV4)

Background:

To initially verify if a telephone line is physically eligible for Digital Subscriber Loop (DSL) service in BellSouth territory, the carrier (BellSouth.net or CLEC/DLEC) can perform a loop qualification inquiry using a BellSouth electronic interface called Loop Qualification System (LQS), also known as "Loopy". A basic response is returned indicating whether the telephone line can potentially support DSL service.

Issue:

KPMG has observed that BellSouth's subsidiary, BellSouth.net, has access to an enhanced version of the LQS electronic interface, also known as "Super Loopy". The Super Loopy electronic interface enables BellSouth.net to retrieve loop qualification information that contains more data about the telephone line, and its physical characteristics, than that contained in a loop qualification report returned through the normal LQS or Loopy electronic interfaced, which would normally be accessed by the DLEC/CLEC.

BellSouth has indicated[1] that accessibility to the Super Loopy electronic interface by BellSouth.net personnel is due to the fact that as the BellSouth.net entity was created personnel were transferred from BellSouth to BellSouth.net. The former BellSouth employees, now BellSouth.net employees, retained access to Super Loopy and the Super Loopy accounts.

Impact:

Prior to ordering a DSL capable loop, CLECs expect to have equal access to loop design information. This information is necessary so that the CLEC can determine the type of

[1] Telephone discussion with BellSouth and KPMG Consulting held on August 22, 2001 at 2:00 PM EST.

DSL service (if any) that the loop they intend to order can support. If Bellsouth.net has access to data that the other Florida based CLECs do not, it affords BellSouth.net a greater competitive advantage.

Date: September 6, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Change Management Verification and Validation Review (PMR-3).

Observation:

KPMG Consulting has discovered that BellSouth has no documented process or control group for monitoring open change requests in TeamConnection. (PMR3)

Background:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is reviewing the adequacy and completeness of key procedures for developing, conducting, monitoring, and publicizing change management for the set of tested performance metrics. KPMG Consulting is also evaluating the extent to which BellSouth adheres to its documented procedures for managing performance metrics.

Issue:

KPMG Consulting reviewed TeamConnection reports for open change requests dating back to October, 2000. KPMG Consulting discovered that BellSouth has one TeamConnection change for a Defect with the highest Defect priority setting. KPMG Consulting also discovered that the Defect change has remained open for over seven months. BellSouth's documentation states that Defect changes with the highest priority setting should be worked continuously until resolved. The fact that a Defect with the highest priority setting has remained open for over seven months indicates that BellSouth is either not tracking the closure of the change, is not working continuously to resolve the Defect as required in the change control manual, or has incorrectly assigned the priority setting.

KPMG Consulting also discovered that BellSouth has six TeamConnection changes for Features with the highest Feature priority setting that have been open for over seven months. BellSouth's documentation indicates that the highest Feature priority setting should be assigned to changes such as those mandated by regulatory orders. The fact that Features with the highest priority setting have remained open for over seven months indicates that BellSouth is either not tracking the closure of the changes, is not working appropriately to resolve the changes, or has incorrectly assigned the priority setting.

KPMG Consulting also found, by attending an internal BellSouth Change Control Board meeting for changes to metrics,[1] that the Change Control Board reviews only current changes that will be included in the next release of Barney and PMAP, but does not

[1] KPMG Consulting attended the Change Control Board meeting on August 14, 2001.

review other open change requests. This review process suggests that BellSouth does not have a documented process for tracking open changes, ensuring that they are completed, and assigning the correct priority to a change request.

Impact:

Without a process to track and/or monitor TeamConnection changes, BellSouth cannot ensure approved changes are being given the correct attention. This impedes BellSouth's ability to ensure true changes of the highest priority are given the proper attention to be worked in a timely manner. Other changes may become forgotten and never addressed or closed.

KPMG Consulting

OBSERVATION 119

BellSouth Florida OSS Testing Evaluation

Date: September 22, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5).

Observation:

KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Completeness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as needed to KPMG Consulting.

Issue:

KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: Acknowledgement Message Completeness" SQM. The discrepancies are listed in the following table.

1	EDI	1.0116044	.9924945
2	TAG	1.0000942	.9999076

[1]These reports are posted on the PMAP Web site.

[2] The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the July 25, 2001 version 2.1.06 of the Manual.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Ordering: Acknowledgement Message Completeness" SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

KPMG Consulting

OBSERVATION 120

BellSouth Florida OSS Testing Evaluation

Date: October 3, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Definitions and Standards Development and Documentation Verification & Validation Review. (PMR-2)

Observation:

KPMG Consulting has found that the reported values for the response time intervals for the "Operations Support Systems: Average Response Time and Response Interval" SQM are reported as percentages and are inconsistent with the documented definition in the *Revised Interim Performance Metrics* SQM (Version 3.00). (PMR2)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission (FPSC), BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

KPMG Consulting has found that the reported values for the response time intervals for the "Operations Support Systems: Average Response Time and Response Interval" SQM are reported as percentages and are inconsistent with the documented definition.

In the "Operations Support Systems: Average Response Time and Response Interval" SQM, the documented definition states, *"Average response time and response intervals are the average times and number of requests responded to within certain intervals for accessing legacy data associated with appointment scheduling, service & feature availability, address verification, request for telephone numbers, and customer service records."* The reported values for the response times for the number of accesses to the legacy system which take less than 2.3 seconds, more than 6 seconds and less than or equal to 6.3 seconds are reported as percentages, not as number of requests.

Impact:

CLECs and regulators rely on BellSouth's metric reports to gauge the level of service provided by BellSouth. When metric values are not reported in a manner that is consistent with what is documented in the SQM, CLECs may find it is difficult to gauge BellSouth's performance.

KPMG Consulting

OBSERVATION 121

BellSouth Florida OSS Testing Evaluation

Date: October 5, 2001

OBSERVATION REPORT

KPMG Consulting has identified an observation as a result of test activities associated with Provisioning Verification and Validation (TVV4).

Observation:

BellSouth's Unbundled Dark Fiber (UDF) procedure document[1] does not reference the requirement for a cross-office continuity test to be performed or provide a cross-office test procedure. (TVV4)

Background:

BellSouth's Unbundled Local Loops (ULL) Provisioning Job Aid for Unbundled Network Element (UNE) Unbundled Loop Design Circuits[2] states that a "...cross-office continuity test must be performed".[3] UDF is classified as a designed ULL.

KPMG Consulting reviewed fifteen (15) Work Force Automation/Control (WFA/C) logs associated with nine (9) UDF orders placed by CLECs with BellSouth Florida between April 1, 2001 and May 31, 2001.

Issue:

BellSouth's UDF documentation neither makes reference to nor includes a procedure for conducting a cross-office continuity test. The need for such testing is stated in BellSouth's ULL provisioning documentation. Furthermore, KPMG Consulting reviewed UDF WFA/C logs and could not validate that cross-office continuity testing was performed prior to turnover of the unbundled dark fiber to the CLEC.

Since a CLEC cannot verify continuity of a dark fiber circuit without a dispatch of its own technicians, KPMG Consulting regards the cross-office continuity test by BellSouth as critical step in the provisioning process. This step should be completed prior to requesting CLEC acceptance of the order by the Customer Wholesale Interconnect Network Services (CWINS)

[1] BellSouth Practice Unbundled Dark Fiber, Section 841-600-119BT, July, 2001

[2] Unbundled Local Loop (ULL) Section 660-230-338, Issue 4, March 29, 2001

[3] Unbundled Local Loop (ULL) Section 660-230-338, Issue 4, March 29, 2001, page 47, SL2 Provisioning Job Aid –UNE, section 9.1.2.

Center. The following examples indicate that cross-office testing is not performed and reveal the subsequent problems associated with the lack of testing:

1. Order 58/LXFU.701534.001.SB (PON-UDFMACL.BLM1)

April 16, 2001	BellSouth changed due date to May 31, 2001 because the assigned dark fiber was in use. Original due date was April 23, 2001.
May 31, 2001	BellSouth wired the circuit. CWINS Center requested and received CLEC acceptance
June 8, 2001	CLEC notified the CWINS Center that the circuit was wired to the wrong Connecting Facility Assignment (CFA) pair. BellSouth found that a change ticket was mistakenly issued in the wrong central office.

2. Order 58/LXFU.701547.001.SB (PON-UDFPCSA.BLM1)

April 16, 2001	BellSouth changed the due date to May 31, 2001. Original due date was April 23, 2001.
May 31, 2001	BellSouth wired the circuit. The CWINS Center requested and received CLEC acceptance.
June 6, 2001	CLEC contacted BellSouth about problems concerning the circuit. BellSouth tests indicated NTF (No Trouble Found).
June 7, 2001	CLEC contacted BellSouth indicating the circuit was still down. A BellSouth technician reported, "...fiber is not in now but should be in today for them to install[4]."

It should be noted that the current BellSouth process does not include cooperative testing with the CLECs prior to the official turnover of unbundled dark fiber. Consequently, CLECs have no feasible alternative but to accept a UDF circuit when BellSouth informs them that it is ready for turnover.

Impact:

By not performing cross-office continuity testing on UDF orders, any errors in the provisioning process may go unnoticed until after the CLEC has accepted delivery of the UDF. This may disrupt the CLEC's planned use of the fiber and harm its relationship with its customers.

[4] Cited from WFA/C log for order 58/LXFU.701547.001.SB (PON-UDFPCSA.BLM1).

KPMG Consulting

OBSERVATION 122

BellSouth Florida OSS Testing Evaluation

Date: October 5, 2001

OBSERVATION REPORT

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

Observation:

KPMG Consulting has not received Completion Notices (CN) to several Local Service Requests (LSRs) submitted via the Telecommunications Access Gateway (TAG) interface. (TVV1)

Background:

Competitive Local Exchange Carrier's (CLECs) send LSRs to BellSouth via TAG. In response to a service request submitted via TAG, BellSouth first sends an Acknowledgment and then a subsequent response of an Error/Reject/Clarification, or a Firm Order Confirmation (FOC) followed by a Completion Notice (CN).

Issue:

Of the LSRs submitted to BellSouth via TAG which received a FOC, 2.4% did not received a CN. KPMG Consulting expects BellSouth to return 99% of CNs [1].

The following PONs submitted using the TAG interface have not received CNs:

005081FPTJ100009	00	9990	05/24/2001
005081FPTJ100010	00	9990	05/24/2001
005081FPTJ100011	00	9990	05/24/2001
005111FPTN10100	02	9990	05/17/2001
012041FPTJ005003	00	9993	06/15/2001
019041FPTJ100016	03	3840	06/29/2001

[1] KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

019041FPTJ100017	01	3840	06/29/2001
019041FPTJ100018	00	3840	06/29/2001
019041FPTJ100022	00	3840	06/29/2001
020021FPTN10001	01	9990	05/22/2001
073051FPTG11001	00	4085	06/14/2001

Impact:

Failure to respond to service requests via TAG could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might experience unnecessary delays due to their inability to determine the status of their service requests. A delay in delivering a service to a customer may negatively impact a customer's perception of a CLEC's service quality.

- **Increase in Operating Costs.** Researching problem resolutions may require additional CLEC resources before successfully processing individual customer orders.

KPMG Consulting

OBSERVATION 123

BellSouth Florida OSS Testing Evaluation

Date: October 5, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the process verification review for Interface Development (PPR 5).

Observation:

BellSouth does not have processes or documentation available with sufficient detail to guide a CLEC to during the upgrade of the Electronic Data Exchange Interface (EDI) and the Telecommunications Access Gateway (TAG). (PPR5)

Background:

During the KPMG Consulting test CLEC upgrade of the TAG interface from 7.5 to TAG 7.5.0.15 on April 2, 2001 several previously transmitted Local Service Requests (LSR's) did not receive responses from BellSouth.

In BellSouth's Amended Response to Observation 64, BellSouth provided a table containing the reasons for certain Test CLEC orders not receiving responses. Several of these were related to the TAG upgrade.

Issue:

KPMG Consulting examined the following publicly available documents:

The BellSouth Electronic Interface Implementation and Upgrade Communications Plan[1]*;*
The Electronic Interface Test Plan[2]*;* and *The BellSouth Electronic Interface Testing Guidelines*[3].

There is no mention of the possible loss of order responses during an upgrade in the above BellSouth documentation.

Impact:

The lack of properly defined procedures for a CLEC during an upgrade may cause the loss of the proper responses to those LSRs. Without a clear understanding of all

[1] *BellSouth Electronic Interface Implementation and Upgrade Communications Plan July, 2001. Available at http://www.interconnection.bellsouth.com/carriertypes/lec/EIITD/EI_Implemen_Upgrade.pdf*
[2] *BellSouth Electronic Interface Test Agreement July, 2001 Available at http://www.interconnection.bellsouth.com/carriertypes/lec/EIITD/EI_Test_Agreement.pdf*
[3] *BellSouth Electronic Interface Testing Guidelines, July 2001. Available at http://www.interconnection.bellsouth.com/carriertypes/lec/EIITD/EI_Test_Guidelines.pdf*

upgrade procedures, a CLEC may not receive the proper notifications for orders transmitted during or immediately before a upgrade. The lack of notification receipt may impact a CLECs ability to provide accurate information to their customers.